

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

ADRIAN LAMAR BRINSON,)
)
)
Plaintiff;) CIVIL ACTION FILE NO.:
)
)
vs.) 4:23-cv-39-WTM-CLR
)
)
SGT. GILSON, *et. al.*,)
)
)
Defendants.)
)

)

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Brittany Beard, through counsel, respectfully moves for an extension of time to answer or otherwise respond to Plaintiff's corrected amended complaint (Docs. 8, 11).

1. Plaintiff is a state prisoner who filed this action under 42 U.S.C. § 1983 on February 9, 2023. (Doc. 1).
2. On March 14, 2023, this Court issued a screening order allowing Plaintiff to proceed on claims against Defendants Beard and Strickland and directing service on those individuals. (Doc. 6).
3. On June 6, 2023, Defendant Beard's waiver of service, which she returned personally before obtaining representation, was docketed before the Court. (Doc. 9).
4. Because the waiver of service was sent to Defendant Beard on April 19, 2023, her answer is due June 20, 2023. (*Id.*).
5. Defendant Beard, through counsel, now respectfully requests a 30-day extension of time to respond to Plaintiff's complaint, through and until Thursday, July 20, 2023.
6. This is the first request for an extension of time made by Defendant Beard. The request is not made for purposes of delay and, instead, the additional time sought herein for

responding to the complaint is needed for counsel to assess the complaint and claims and prepare an appropriate response.

WHEREFORE, Defendant Beard respectfully requests that the Court grant this motion and extend the deadline for the filing of an answer or motion to dismiss for 30 days from June 20, 2023, to and including July 20, 2023. A proposed order is attached hereto.

Respectfully submitted,

PLEASE ADDRESS ALL
COMMUNICATIONS TO:
Wade W. Herring, III
State Law Department
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
Tel: (404) 458-3375
Fax: (404) 651-5304
Email: wherring@law.ga.gov

Christopher M. Carr	112505
Attorney General	
Loretta L. Pinkston-Pope	580385
Deputy Attorney General	
Roger A. Chalmers	118720
Senior Assistant Attorney General	
<u>/s/Wade W. Herring, III</u>	278313
Wade W. Herring, III	
Assistant Attorney General	

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record: NONE.

I further certify that on this date this document has been served by U.S. mail, first class postage prepaid, on the following non-CM/ECF participant on:

Adrian Lamar Brinson
GDC No. 1171205
Central State Prison
4600 Fulton Mill Road
Macon, Georgia 31208

This 20th day of June, 2023.

/s/ Wade W. Herring, III
Wade W. Herring, III
Assistant Attorney General

State Law Department
40 Capitol Square SW
Atlanta, GA 30334
Tel: (404) 458-3375
Fax: (404) 651-5304
Email: wherring@law.ga.gov